

From: Jason@levinepstein.com,
To: juanplata@aol.com,
Cc: Joshua@levinepstein.com,
Subject: RE: Gursewak Singh
Date: Mon, Oct 7, 2019 5:42 pm

Jonathan,

1. We supplemented approximately 114 pages of **new** documents. The other documents you are referring to in the DropBox were produced throughout fact discovery.
2. Please note than pages 115-176 of today's production are duplicate checks of what was produced today.
3. Copies of whatever checks were issued to your client should be in your clients possession. Did you ask your client if he has records of any deposited checks?
4. Your characterization of my client's testimony is false and misleading. The record is clear.
5. My client is not in possession of any additional documents. We consent to an extension, however, on the basis that we intend to supplement our document requests on the basis of information gleaned during the course of your client's deposition.
6. We object to any anticipated continued deposition of my client.

Jason

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